

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

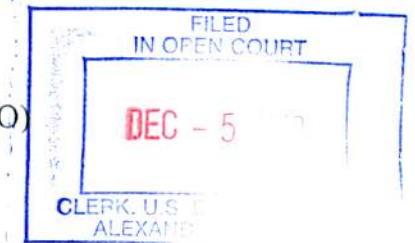
UNITED STATES OF AMERICA

v.

ANGEL HOANG LE,

Defendant.

No. 1:19-cr-57 (LO)



STATEMENT OF FACTS

The United States and the defendant, Angel Hoang Le (hereinafter “the defendant”), agree that the United States would have proven the following facts at trial, beyond a reasonable doubt, with admissible and credible evidence:

1. From in and around March 2017, and continuing until in or about January 2018, in Lorton, Virginia, within the Eastern District of Virginia, the defendant, did unlawfully, knowingly, and intentionally lease, rent, use, and maintain an apartment located at 9030 Lorton Station Boulevard, Lorton, Virginia, for the purpose of distributing and using marijuana, Tetrahydrocannabinol (“THC”), and other controlled substances, in violation of Title 21, United States Code, Section 856(a)(1).

2. From in and around March 2017, until the defendant’s arrest in April 2019, the defendant was in a relationship with Peter Le. At that time, Peter Le occupied a leadership role in Club Tigers, a criminal street gang operating in northern Virginia.

3. During this time period, the defendant and Peter Le lived together at the apartment located in Lorton and at other locations. At each location, Peter Le stored marijuana and other controlled substances. Further, Peter Le conducted drug transactions and gang-related

activity at the apartment located in Lorton and other locations. The defendant was present in the apartment for many of the drug transactions and gang-related activities. Moreover, the defendant was aware that the apartment located in Lorton and other locations were used for the purpose of distributing and using marijuana.

4. The defendant's role was to account for the drug proceeds owed to Peter Le. At the apartment located in Lorton, the defendant maintained a money counter and other bookkeeping materials. The defendant was also responsible for depositing at least some of the drug proceeds into bank accounts maintained at BB&T Bank. Further, Peter Le also instructed individuals to transfer money to the defendant via her Venmo account.

5. As part of its investigation, the United States has obtained some of the defendant's bank account records. While analysis of these records is still ongoing, it does reveal that the defendant deposited approximately \$176,000 into one of her bank accounts with BB&T Bank. The defendant agrees that the \$176,000 are drug proceeds. Moreover, the \$176,000 does not reflect all of the drug proceeds that the defendant maintained on behalf of Peter Le and other co-conspirators.

6. On or about February 15, 2019, law enforcement arrested Peter Le. After Peter Le was arrested, the defendant contacted individuals in an effort to collect drug debts on Peter Le's behalf.

7. The defendant was aware that Peter Le and other co-conspirators possessed firearms when they distributed controlled substances. For instance, at the apartment located in Lorton, Peter Le and others possessed a pistol in furtherance of the conspiracy. Further, the defendant regularly observed other members of Club Tigers and the Reccless Tigers in possession of firearms.

8. During the course of this conspiracy, the defendant was personally involved in the distribution of, or it was reasonably foreseeable to the defendant that her co-conspirators distributed in furtherance of the conspiracy, at least 400 kilograms but less than 700 kilograms of converted drug weight (Level 26).

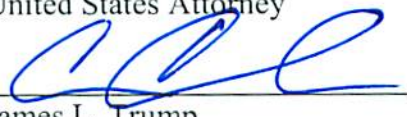
9. The acts taken by the defendant in furtherance of the offense charged in this case, including the acts described above, were done willfully and knowingly with the specific intent to violate the law, and were not committed by mistake, accident or other innocent reason.

10. The foregoing statement of facts does not describe all of the defendant's conduct relating to the offense charged in this case nor does it identify all of the persons with whom the defendant may have engaged in illegal activities.

Respectfully submitted,

G. Zachary Terwilliger  
United States Attorney

By:

  
James L. Trump  
Carina A. Cuellar  
Assistant United States Attorneys

Defendant's Signature: After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, Angel Hoang Le, and the United States, I hereby stipulate that the above statement of facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

Date: 11/29/2019

Angel  
Angel Hoang Le  
Defendant

Defense Counsel Signature: I am counsel for the defendant in this case. I have carefully reviewed the above statement of facts with her. To my knowledge, her decision to stipulate to these facts is an informed and voluntary one.

Date: 11/29/2019

Michael E. Hendrickson  
Michael E. Hendrickson, Esq.  
Counsel for the defendant